



# Friends *of the* San Juans

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Washington Utilities and Transportation Commission  
P.O. Box 47250  
Olympia, WA 98504-7250

Submitted via email: [comments@utc.wa.gov](mailto:comments@utc.wa.gov)

RE: Docket Number 220513

Dear Commissioners,

Friends of the San Juans respectfully asks the Washington Utilities and Transportation Commission (UTC) to consider, in your tariff setting, the role of Puget Sound Pilots in protecting the Salish Sea ecosystem from accidents and oil spills.

Friends of the San Juans is a nonprofit organization based in Friday Harbor, Washington, with the mission to protect and restore the San Juan Islands and the Salish Sea for people and nature. Friends of the San Juans was established in 1979, represents over 2,000 members, and works with diverse stakeholders including citizens, committees, tribal and governmental agencies, and other non-profit organizations in the transboundary region of the Salish Sea. In 2001, Friends of the San Juans was a co-petitioner that led to the federal listing of the Southern Resident killer whales as an endangered species. The protection and recovery of the Southern Residents continues to be one of our top priorities. According to NOAA, a major oil spill could be catastrophic to the critically endangered Southern Resident killer whales, and oil spill prevention is a key strategy to avoid their extinction.<sup>1</sup>

The risk of a major oil spill threatens endangered species, the marine ecosystem as well as our human communities that depend on a healthy environment for social, cultural and economic well-being. According to the Washington State Department of Ecology:

For the 2.8 million households in Washington, the collective willingness to pay to avoid spill impacts for a decade would be \$259 million (2022\$) for ten-year protection, or \$492 million in 20-year present value for two payments ten years apart.

In 2004, Ecology funded extensive modeling of potential spills in Washington. Adjusted for inflation, a single large spill in Washington could result in losses of over \$15 billion (2022-dollars).<sup>2</sup>

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<sup>1</sup> *Recovery Plan for Southern Resident Killer Whales*, National Oceanic and Atmospheric Administration, 2008.  
<https://repository.library.noaa.gov/view/noaa/15975>.

<sup>2</sup> *Preliminary Regulatory Analyses for Chapters 173-180 and 173-184 WAC*, January 2023, Publication 23-08-001.  
<https://apps.ecology.wa.gov/publications/SummaryPages/2308001.html>.

Puget Sound Pilots are essential to achieving Washington State's zero spills strategy as stated in [RCW 90.56.005\(2\)](#):

The legislature finds that prevention is the best method to protect the unique and special marine environments in this state. The technology for containing and cleaning up a spill of oil or hazardous substances is at best only partially effective. Preventing spills is more protective of the environment and more cost-effective when all the response and damage costs associated with responding to a spill are considered. Therefore, the legislature finds that the primary objective of the state is to achieve a zero spills strategy to prevent any oil or hazardous substances from entering waters of the state.

Friends of the San Juans urges the UTC to ensure that the rates charged by Puget Sound Pilots are fair, just, reasonable, and sufficient to ensure the protection of the Washington State waters of the Salish Sea. Fair compensation for services provided by Puget Sound Pilots should ensure that there are sufficient pilots to provide the essential service of piloting large commercial ships. This requires nationally competitive compensation and benefits and authorization for the number of pilots that enables use of best work and rest practices that are consistent with other critical transportation services. Puget Sound Pilots needs to recruit and retain pilots who are the best in the world. Friends of the San Juans urges the UTC to fund the pilotage system accordingly.

The local knowledge that Puget Sound Pilots bring to piloting large commercial ships through the inland waters' narrow passages is vital to the protection of Washington State's waters and social, cultural and economic resources.

Thank you for considering these comments.

Sincerely,



Lovel Pratt  
Marine Protection and Policy Director